

October 29, 2013

BY ELECTRONIC MAIL AND U.S. MAIL

Gloria Moran, Esq.
Assistant Regional Counsel
Superfund Branch (6RC-S)
U.S. EPA, Region 6
1445 Ross Ave.
Dallas, TX 75202-2733

Re: Arkwood Superfund Site, near Omaha, AR;
McKesson Request to Meet with EPA Region 6.

Dear Ms Moran:

As counsel representing McKesson Corp., we request a meeting of principals and attorneys from McKesson Corp. and EPA Region 6 in the next 30 to 60 days to discuss a number of continuing concerns we have with Region 6's management of the Arkwood site ("Site"). Please provide us with a few dates and times that are convenient for the relevant persons in your office to participate in such a meeting.

A list of the concerns that we would like to discuss include the following:

- Ongoing meetings, discussions and emails between EPA and the landowner's representative, Curt Grisham, regarding site conditions and status, without McKesson involvement, despite McKesson being the Site's Project Manager for over 20 years;
- The landowner's contractual obligation to McKesson not to discuss this Site with any regulatory agency without McKesson's prior consent, which has not been given, and McKesson's ongoing request that EPA not discuss this matter further with the landowner or his representative (who are not acting as members of the general public, based on repeated representations to the contrary);
- EPA's refusal to withdraw the Site's "ready for reuse" designation despite its arbitrary and capricious failure to comply with its own practices and procedures in adopting that designation, including the absence of appropriate, comprehensive deed restrictions and the need for the completion of the ongoing site re-evaluation for dioxin risks;
- The status of the pending amended deed restriction recordation process and the EPA's proposed response to McKesson's redline changes, which are consistent with the

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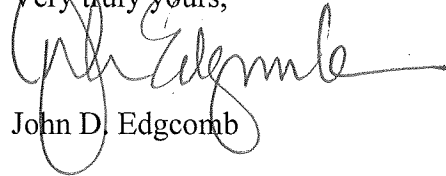
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Site's Record of Decision, and related comments (i.e. confirming the correct metes and bounds description of the property subject to the deed restriction is being used);

- The status of property sale negotiations between McKesson and the property owner, including the owner's unrealistic and unsupported demands;
- EPA's improper charging to McKesson as administrative oversight costs the extensive Freedom of Information Act ("FOIA") response costs attributable to repeated demands made by the landowner's agent, which are not legitimate oversight costs chargeable to McKesson and instead should be charged to the landowner's agent under FOIA.

We look forward to hearing from you as to your available dates and times.

Very truly yours,



John D. Edgcomb

cc: C. Sanchez (EPA Region 6) (by email only)
S. Tzhone (EPA Region 6) (by email only)
C. Ungvarsky, Esq. (McKesson) (by email only)
J. Mescher (McKesson) (by email only)
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